

Before the
Federal Communications Commission
Washington, DC

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Section 202(b),)
Table of Allotments,) RM-
FM Broadcast Stations)
(Bulls Gap, Tennessee))

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

Bulls Gap Broadcasting ("Bulls Gap"), by its attorney, hereby requests that the Commission amend the Table of Allotments as follows:

<u>Community</u>	<u>Current</u>	<u>Proposed</u>
Bulls Gap, Tennessee	--	264A

In support thereof, the following is stated:

This channel can be allotted to Channel 264A in full accord with the Commission's spacing rules. Attached hereto is a Technical Statement which demonstrates that Channel 264A can be allotted to Bulls Gap, Tennessee at 36° 15' 23" N, 83° 06' 34" W, which will prevent any shortspacing from occurring with any currently authorized or proposed facility.

Adoption of this proposal will be in the public interest. As demonstrated in the Technical Statement, approval of this proposal will allow Bulls Gap to provide first local service to Bulls Gap, Tennessee.

Accordingly, Bulls Gap Broadcasting respectfully requests that this Petition be adopted, that the Commission amend the FM Table of Allotments to specify Channel 264A at Bulls Gap, Tennessee, and that the Commission request comment on the proposal contained

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herein.

Respectfully submitted,

BULLS GAP BROADCASTING

By: _____
Dan J. Alpert

Its Attorney

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August 19, 1994

ENGINEERING STATEMENT

BULLS GAP, TENNESSEE CHANNEL 264A

by
BULLS GAP BROADCASTING

The attached engineering study of channel 264A for Bulls Gap, Tennessee was performed using the Commission's separation criteria contained in 47 C.F.R. Section 73.207, Minimum Distance Separation Between Stations. This study indicates that channel 264A can be assigned to Bulls Gap, Tennessee 1/ with the reference point 2.2 kilometers west (274 degrees) of the community 2/. The proposed allocation point will avoid short-spacing WZJS, channel 264A, licensed to Banner Elk, North Carolina (BLH-920623KB).

The FM Channel Spacing Study and Clearance Map, attached as Exhibit I and II demonstrate that there is land west of Bulls Gap, Tennessee which will accommodate the site restriction and also provide for a tower site.

At maximum facilities (6 kw ERP; 100m HAAT) a class A city-grade contour will cover approximately 16 kilometers from the antenna site. Therefore it is quite possible to

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- 1/ Bulls Gap, Tennessee center city coordinates:
N LAT 36-15-18; W LNG 83-05-06
 - 2/ Proposed Reference Coordinates for channel 264A:
N LAT 36-15-23; W LNG 83-06-34

provide Bulls Gap, Tennessee with the required city-grade coverage from a transmitter site within the clearance area shown on Exhibit II.

CONCLUSION

This proposal meets the separation requirements of Section 73.207 for all existing FM assignments. It also meets the city-grade coverage requirement of Section 73.315 since adequate land is available within the clearance area to provide the principal community with city-grade coverage. Furthermore, the public interest will be served by allocating channel 264A to Bulls Gap, Tennessee as its first commercial FM facility.

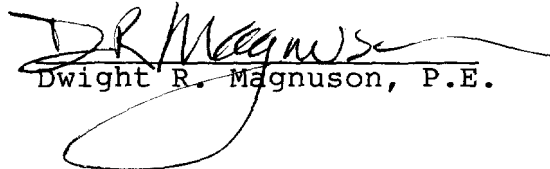

Dwight R. Magnuson, P.E.

EXHIBIT I

FM CHANNEL SPACING STUDY

Job title: Bulls Gap, TN Allocation Point
 Channel: 264A

Latitude: 36 15 23
 Longitude: 83 6 34

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
263C1	WSSLFM	5487	Gray Court	SC	CP	148.9	198.3	133.0	
264A	WZJS	5527	Banner Elk	NC	LIC	94.1	115.0	115.0	.0
264A	WRICFM	5560	Richlands	VA	CP	47.0	146.8	115.0	31.8
264A	WRICFM	5562	Richlands	VA	LIC	47.0	146.8	115.0	31.8
263C	WSSLFM	6118	Gray Court	SC	LIC	153.9	207.7	165.0	
266C	WROQ	6148	Anderson	SC	LIC	156.7	194.1	95.0	
266C	WSGS	6813	Hazard	KY	LIC	356.5	104.2	95.0	9.2
262C	WOKIFM	7426	Oak Ridge	TN	LIC	266.6	101.0	95.0	6.0
210C3	WDVX	7432	Clinton	TN	CP	266.6	101.0	12.0	
264C	WUSY	8060	Cleveland	TN	LIC	239.9	228.8	226.0	2.8

***** End of channel 264 study *****



KILOMETERS

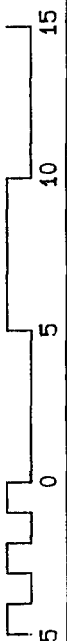


EXHIBIT II

AREA FOR FM SITE

Bulls Gap, TN 264A